

UNITED STATES DISTRICT COURT

for the
District of South CarolinaIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)897 Fording Island Road, Unit 1213,
Bluffton, SC 29910

Case No. 2:20-cr-566-MHC

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

897 Fording Island Road, Unit 1213, Bluffton, SC 29910 (See attachment A)

located in the _____ Judicial _____ District of _____ South Carolina _____, there is now concealed (identify the person or describe the property to be seized):

See attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 USC 1341	Frauds and Swindles
18 USC 1343	Fraud by Wire
18 USC 1956	Laundering of monetary instruments

The application is based on these facts:
See attached affidavit

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

David Moody, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 1 September 2020

City and state: Charleston, SC



Judge's signature

Molly H. Cherry, US Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

IN THE MATTER OF THE SEARCH OF) Case No. 2:20-cr-566-MHC
)
)
897 Fording Island Road, Unit 1213)
Bluffton, SC 29910)

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT

I, David P. Moody, a Special Agent with Immigration and Customs Enforcement, Homeland Security Investigations (“ICE/HSI”), United States Department of Homeland Security, being first duly sworn, depose and state under oath as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516.

2. I am a Special Agent with the United States Immigration and Customs Enforcement (“ICE”), Homeland Security Investigations (“HSI”) and have been so employed since April of 2002. I am currently assigned to the HSI Charleston, SC office. My responsibilities as a Special Agent include investigating crimes involving financial violations, including, but not limited to, offenses involving money laundering, bulk cash smuggling and wire and mail fraud. I am a graduate of the Federal Law Enforcement Training Center and the U.S. Customs Service Academy.

3. As a Special Agent with HSI, I have received training in the investigation and prosecution of violations of Customs and Immigration laws, including those related to money laundering, bulk cash smuggling and wire and mail fraud. I have also received specific training for investigations relating to computers. Moreover, I am a federal law enforcement officer who is engaged in enforcing criminal laws, including Title 18, United States Code, Sections 1341, 1343, and 1956, and I am authorized by law to request a search warrant.

4. This Affidavit is made in support of an Application for a warrant to search the following location:

A. 897 Fording Island Road, Unit 1213, Bluffton, SC 29910

(See Attachment A for a description and photo of the residence to be searched).

SOURCES OF INFORMATION

5. I make this Affidavit based upon personal knowledge derived from my participation in this investigation and/or information that I have learned from discussions with Special Agents of HSI and/or other law enforcement officers; from other personnel specially trained in the seizure and analysis of computers and electronic media; from the review of written reports of investigations; from physical surveillance conducted by federal agents and/or other law enforcement officers; and from my experience and training.

6. Unless otherwise noted, wherever in this Affidavit I assert that a statement was made, the information was provided by another law enforcement officer (who may have had either direct or hearsay knowledge of the statement) to whom I have spoken or whose report I have read and reviewed. Such statements are stated in substance, unless otherwise indicated. Wherever in this Affidavit I state a belief, such belief is based upon my training and experience and the information obtained through this investigation.

7. Based on my training and experience and the facts set forth in this Affidavit, there is probable cause to believe that violations of Title 18, United States Code, Sections 1341, 1343 and 1956 have been committed and that evidence exists at the residence known as **897 Fording Island Road, Unit 1213, Bluffton, SC 29910**. There is probable cause to search the premises described in Attachment A for evidence of these crimes, as described in Attachment B.

SPECIFIED FEDERAL OFFENSES

8. Title 18, United States Code, Section 1341 (Frauds and Swindles, Mail Fraud)
9. Title 18, United States Code, Section 1343 (Fraud by Wire)
10. Title 18, United States Code, Section 1956 (Laundering of Monetary Instruments)

INVESTIGATION OVERVIEW

11. Homeland Security Investigations (“HSI”) and the United States Postal Inspection Service (“USPIS”) are investigating a cash award/sweepstakes scheme organization with domestic and international connections. The investigation has identified Theresa LAWSON and Rojay LAWSON, collectively “the defendants”, and others that have participated in the cash award/sweepstakes scheme. It is alleged that this organization is contacting elderly victims throughout the United States, via phone and mail, and informing the victims that they are the winner of a sweepstakes. The sweepstakes winnings usually consist of millions of dollars, a new car, a new TV and other items. The victims are then told to pay taxes and/or fees in order to claim their purported winnings. Elderly victims have purchased USPS money orders and bank money orders, mailed cash/personal checks/cashier’s checks/money orders, deposited money into bank accounts and sent wire transfers to the defendants and their co-conspirators for the purpose of paying these purported taxes and fees. No identified victims of this investigation have received any winnings from the sweepstakes they were told they won.

12. It is alleged that this organization is responsible for defrauding elderly victims of money and subsequently transferring a portion of that money to co-conspirators in Jamaica and elsewhere and keeping a portion of the victims' money for their own benefit. The defendants have transferred money to Jamaican co-conspirators via the following methods: wire transfers (Western Union, MoneyGram, etc.), bank transfers and ATM withdrawals in Jamaica from bank accounts established by the defendants.

13. The Western Union Company ("Western Union") offers consumer to consumer money transfer services. Consumers in the United States can send funds from Western Union agent locations, by phone and online, and receivers can pick up available funds at Western Union agent locations. Western Union has agent locations in the United States, Jamaica and elsewhere. As part of Western Union's normal course of business, Western Union collects specific information pertaining to the sender and receiver of the wire transfer. This information is used by Western Union to safely transfer funds from and to the intended parties. The information collected by Western Union includes, but is not limited to; name, address, phone number, identification type and number, transaction control number and amount of transaction.

14. MoneyGram International Inc. ("MoneyGram") offers consumer to consumer money transfer services. Consumers in the United States can send funds from MoneyGram agent locations, and receivers can pick up available funds at MoneyGram agent locations. MoneyGram has agent locations in the United States, Jamaica and elsewhere. As part of MoneyGram's normal course of business, MoneyGram collects specific information pertaining to the sender and receiver of the wire transfer. This information is used by MoneyGram to safely transfer funds from and to the intended parties. The information collected by MoneyGram includes, but is not limited to; name, address, phone number, identification type and number, transaction control number and

amount of transaction.

STATEMENT OF PROBABLE CAUSE

15. Homeland Security Investigations (“HSI”) and the United States Postal Inspection Service (“USPIS”) are investigating a cash award/sweepstakes scheme organization with domestic and international connections. The investigation revealed that Theresa LAWSON and Rojay LAWSON are utilizing numerous bank accounts and addresses (most recently **897 Fording Island Road, Unit 1213, Bluffton, SC 29910**) to receive funds from scam victims. The victims are contacted via phone and mail, and informed they are the winner of a sweepstakes. The victims are then told to pay taxes and/or fees in order to claim their winnings. Elderly victims have purchased USPS money orders and bank money orders; mailed cash/personal checks/cashier’s checks/money orders to **897 Fording Island Road, Unit 1213, Bluffton, SC 29910** and other addresses used by the defendants; deposited money into the defendants’ bank accounts; and sent wire transfers to the defendants and their co-conspirators for the purpose of paying these purported taxes and fees.

16. It is alleged that the defendants and others are responsible for defrauding approximately 175 victims of over \$700,000 and subsequently transferring a portion of that money to co-conspirators in Jamaica and elsewhere while keeping a portion of the victims’ money for their own benefit. The defendants have transferred money to Jamaican co-conspirators via the following methods: wire transfers (Western Union, MoneyGram, etc.), bank transfers and ATM withdrawals from established bank accounts.

17. In March 2017, USPIS Charleston initiated an investigation into Theresa LAWSON, at 160 University Parkway, Bluffton, SC. USPIS Inspector Leah Moody received information from the Bluffton Post Office Carrier Annex regarding an Express Mail parcel from

victim IT¹ in Centerville, IA. The parcel was delivered to Theresa LAWSON at 160 University Parkway. Further information received from the Bluffton Post Office revealed they received a fraud complaint in the past related to 160 University Parkway.

Investigation into 160 University Parkway

18. On April 5, 2017, Inspector Moody researched the address 160 University Parkway. CLEAR² revealed Theresa LAWSON was listed as a 47-year-old resident at the address. Postal records for 160 University Parkway revealed the residence had received at least 65 Express Mail or USPS Priority Mail parcels in the last year. Several of those mailings were from Centerville, IA.

19. On April 6, 2017, Inspector Moody contacted the Centerville, IA Post Office and spoke with USPS employee Hedgecock. Hedgecock was familiar with IT and informed Inspector Moody that IT had lost money to a scam. IT was an 88-year-old victim who resided in Centerville, IA. IT told Hedgecock she was mailing money in an attempt to claim sweepstakes winnings. IT mailed thousands of dollars at a time. Hedgecock contacted IT's daughter in an attempt to stop IT from mailing money. According to Hedgecock, IT began receiving money from other individuals in the mail and sent that money to unknown people in an effort to get her money back. Wire transfer records show IT wired approximately \$1,912 to Theresa and Rojay LAWSON³ via Western Union and Walmart. IT has not received any cash award from the purported sweepstakes.

¹ The victims' initials will be used throughout this affidavit in an attempt to protect the victims' identity.

² CLEAR is a public records database containing information derived from commercially available data sources on addresses and persons for utilization in law enforcement intelligence and investigative purposes.

³ Rojay LAWSON was identified as Theresa LAWSON's son. I conducted database queries on Rojay LAWSON which revealed he is a Jamaican National with a US Legal Permanent Residence card. Rojay LAWSON has a date of birth of 11/07/1997.

Information received by Inspector Moody indicates IT is now deceased.

20. Inspector Moody began conducting a more thorough review of the mailings to 160 University Parkway and discovered numerous suspected⁴ victims. Inspector Moody found an IC3⁵ complaint identifying GR as a victim in a Publisher's Clearing House sweepstakes scam. GR is an 89-year-old victim who resides in Bells, TX. Review of the IC3 complaint revealed GR received a phone call from an individual identifying himself as "David Anderson." Anderson told GR he was the Publisher's Clearing House winner of \$2.5 million and a new Mercedes. Anderson instructed GR to send \$1,795 to Theresa LAWSON, 160 University Parkway, Bluffton, SC in order to claim his prize. FedEx records showed one mailing from GR to Theresa LAWSON on or about February 15, 2017. GR has not received any cash award from the purported sweepstakes.

21. On June 29, 2017, Inspector Moody interviewed victim CW regarding an Express Mail he mailed to 160 University Parkway and then recalled. CW is a 50-year-old victim who resides in Hope, AR. CW said he was contacted via phone by an unknown individual who told CW he won a sweepstakes of \$25 Million dollars and a car; however, he needed to pay taxes on the winnings. CW stated he first wired approximately \$2,000 and then was told he needed to pay \$500 for a government stamp. CW purchased a \$500 USPS money order and mailed it to 160 University Parkway. After he mailed the \$500, CW determined he was being scammed and recalled the mailing. CW received multiple phone calls from numerous individuals related to the sweepstakes scam. CW has not received any cash award from the purported sweepstakes.

⁴ Throughout this affidavit, I refer to some victims as "suspected" victims. Suspected victims have not been confirmed as victims through interviews, police reports, or other investigative means. However, the conduct and patterns of the suspected victims are consistent with the facts surrounding confirmed victims and the other details of the investigation.

⁵ IC3 is a public reporting mechanism, maintained by the FBI, in which victims can report complaints about potential crimes.

22. In January 2018, HSI Charleston initiated an investigation based on information received from USPIIS Charleston. I conducted database queries on Theresa LAWSON which revealed Theresa LAWSON is a Jamaican National, born in Westmoreland, JM, entered the United States on or about 05/02/2012 with a B2 visa. Theresa LAWSON has a Jamaican passport (A2302100) and a date of birth of 04/06/1969.

23. In February 2018, I issued summonses to FedEx Ground and FedEx Express. The summons issued to FedEx requested information related to shipments delivered to 160 University Parkway, Bluffton, SC 29909.

24. On February 16, 2018, I received a response from FedEx Ground. FedEx Ground identified approximately 11 deliveries to Theresa LAWSON at 160 University Parkway, Bluffton, SC 29909.

25. On February 27, 2018, I received a response from FedEx Express. FedEx Express identified approximately 30 deliveries to 160 University Parkway, Bluffton, SC 29909. The shipments were addressed to various names including the following: Theresa LAWSON, Jerry Mackey, Mary Jean, Mary Jane, Diane Smith, Dorothy, Pat Stone, Patricia Stone and Andetia McClain. The deliveries were made between May 2013 and October 2017. I identified approximately 8 suspected victims that sent packages to 160 University Parkway.

26. FedEx Express records revealed a mailing from victim IK to Theresa LAWSON, 160 University Parkway, Bluffton, SC 29909 on April 24, 2017. Records showed "V. FLETCHER" signed for the parcel. Research of IK revealed a LAPD police report filed on April 27, 2017 regarding IK being involved in a Publisher's Clearing House scam. IK is a 90-year-old victim who resides in Grands Hills, CA. IK stated she received a letter purporting to be from Publisher's Clearing House. IK was instructed to mail \$50 then \$4900 in order to

receive her winnings. IK subsequently mailed money attempting to claim her sweepstakes winnings. IK has not received any cash award from the purported sweepstakes.

27. On or about May 3, 2018, suspected victim BT mailed an Express Mail parcel to Rojay LAWSON at 160 University Parkway, Bluffton, SC. BT is an 86-year-old suspected victim who resides in Tappahannock, VA.⁶ The mailing was identified by the USPIS as being associated with a sweepstakes scam and returned to BT. Walmart wire records revealed BT has wired approximately \$3,570 to Theresa and Rojay LAWSON.

Investigation into 379 Shadowbrook Lane, Unit 108

28. On or about July 26, 2018, Theresa LAWSON submitted a change of address request to the USPS from 160 University Parkway to 379 Shadowbrook Lane, Unit 108, Ridgeland, SC 29936.

29. On or about June 4, 2018 and again in July 2018, suspected victim EM mailed two mailings to Rojay LAWSON at 160 University Parkway. EM is an 80-year-old suspected victim who resides in Warsaw, NC.⁷ USPS records showed approximately 14 mailings from EM to 160 University Parkway and 379 Shadowbrook Lane, Unit 108 between December 2017 and June 2019.

30. On or about January 9, 2019, suspected victim BJ mailed an Express Mail parcel to "JoJay" LAWSON at 379 Shadowbrook Lane, Unit 108. BJ is a 77-year-old

⁶ BT has not been interviewed. BT has no apparent or legitimate relationship with Theresa or Rojay LAWSON. Based on my experience of investigating sweepstakes scams, I know scammers target elderly individuals and instruct them to mail and wire funds for purported fees and taxes. Scammers will communicate with victims usually numerous times daily and continue to instruct victims to send money for fees/taxes as long as victims will continue to send money. BT is 86 years old and has mailed at least 1 parcel and sent 7 wire transfers to the LAWSONs.

⁷ EM has not been interviewed. EM has no apparent or legitimate relationship with Theresa or Rojay LAWSON. Based on my experience of investigating sweepstakes scams, the facts surrounding EM's money transfer are consistent with the confirmed victims in this investigation.

suspected victim who resides in Dallas, TX.⁸ USPS records showed approximately 9 mailings from BJ to 160 University Parkway and 379 Shadowbrook Lane, Unit 108 between May 2018 and January 2019.

31. On or about July 1, 2019 and again on or about July 9, 2019, suspected victim JG sent mailings addressed to Theresa LAWSON “CPA” at 379 Shadowbrook Lane, Unit 108. JG is a 91-year-old suspected victim who resides in Hobe Sound, FL.⁹ USPS records showed approximately 4 mailings from JG to Theresa LAWSON at 379 Shadowbrook Lane, Unit 108 between April 2019 and July 2019.

Investigation into 897 Fording Island Road, Unit 1213, Bluffton, SC 29910

32. On or about July 30, 2019, Theresa LAWSON submitted a change of address request to the USPS from 379 Shadowbrook Lane, Unit 108 to **897 Fording Island Road, Unit 1213, Bluffton, SC 29910**.

33. On or about September 4, 2019, victim CC sent a mailing addressed to Theresa LAWSON “CPA” at **897 Fording Island Road, Unit 1213, Bluffton, SC 29910**. The mailing was signed for by Rojay LAWSON. Inspector Moody conducted an interview of CC. CC is an 82-year-old victim who resides in De Mossville, KY. CC stated she received a phone call from an individual who associated himself with Publisher’s Clearing House. The individual told CC she won \$5.5 million and a new car. The caller instructed CC to send \$65

⁸ BJ has not been interviewed. BJ has no apparent or legitimate relationship with Theresa or Rojay LAWSON. BJ is 77 years old and has mailed approximately 9 parcels to the LAWSONs. Based on my experience of investigating sweepstakes scams, the facts surrounding BJ’s mailings are consistent with confirmed victims in this case.

⁹ JG has not been interviewed. JG has no apparent or legitimate relationship with Theresa or Rojay LAWSON. Based on my experience of investigating sweepstakes scams, I know scammers will sometimes identify themselves as business or government officials. Based on my research and knowledge of Theresa LAWSON, I do not believe she is a CPA.

to LAWSON for a licensing tax on the car. CC advised that she does not know Theresa LAWSON and was told by the caller that Theresa LAWSON was a CPA. CC has not received any cash award from the purported sweepstakes.

34. On January 29, 2020, Inspector Moody conducted surveillance of **897 Fording Island Road, Unit 1213, Bluffton, SC 29910**. Building 12 was located within the Plantation Point complex. Inspector Moody located a mail house, near building 12, which contained a mailbox marked 1213. Building 12 contained units 1201 through 1214. Unit 1213 was located on the back-left side of building 12. During surveillance, Inspector Moody observed a Volkswagen Jetta registered to Shakera Snyder (“Snyder”) parked near unit 1213. Snyder has previously been observed with Rojay LAWSON at his prior address at 379 Shadowbrook Drive. Inspector Moody also observed Express Mail parcel EE478004465US being delivered to box 1213.

35. A review of USPS records showed Express Mail parcel EE478004465US was mailed by suspected victim HP to Rojay LAWSON, **897 Fording Island Road, Unit 1213, Bluffton, SC 29910**. HP is an 82-year-old suspected victim who resides in Fresno, CA.¹⁰ USPS records also showed two additional mailings from HP to **897 Fording Island Road, Unit 1213, Bluffton, SC 29910** during January and February 2020.

36. On or about May 1, 2020, a USPS mailing (EJ344001626US) from victim PW was delivered to Theresa LAWSON “CPA” at **897 Fording Island Road, Unit 1213, Bluffton, SC 29910**. PW is a 68-year-old victim who resides in Yakima, WA. Inspector Moody interviewed PW who advised she was contacted via phone by an unknown individual

¹⁰ HP has not been interviewed. HP has no apparent or legitimate relationship with Theresa or Rojay LAWSON or Shakera Snyder. Based on my experience of investigating sweepstakes scams, HP’s mailings and money transfers are consistent with the other confirmed victims in this case.

who associated himself with Publisher's Clearing House. PW was told she won \$3 million and a car. PW was instructed to send \$65 to "Theresa LAWSON, CPA" for a retainer fee in helping with her sweepstakes winnings. PW was contacted again and instructed to purchase a USPS money order for taxes and fees. USPS records showed a money order purchased by PW on April 29, 2020 in the amount of \$499 and a Priority Mail Express envelope (EJ344001626US) addressed to "Theresa LAWSON CPA." PW subsequently mailed the money order to Theresa LAWSON, CPA. PW has not received any cash award from the purported sweepstakes.

37. On May 5, 2020, Inspector Moody discovered a police report made by the Yuma County Sheriff's Office in July 2018 concerning suspected victim BS. BS is a 75-year-old suspected victim who resides in Yuma, AZ. Yuma County SO interviewed BS and BS's son. BS suffers from early onset of dementia. BS received phone calls from individual using the name "James." James instructed BS to send money for a sweepstakes BS thought she had won. BS also began receiving money and checks from unknown individuals. BS was unable to provide detailed information about her encounter with James.

38. On May 6, 2020, Inspector Moody identified an Express Mail mailing destined for **897 Fording Island Road, Unit 1213, Bluffton, SC 29910**. The mailing was addressed to Theresa LAWSON and was from victim BH in Lansing, KS with an expected delivery date of May 7, 2020. On May 7, 2020, Lansing PD interviewed BH and her friend JR. BH is an 87-year-old victim who resides in Lansing, KS. BH and JR received several phone calls from an unknown individual who associated himself with Publisher's Clearing House. The caller advised BH and JR they won a sweepstakes of \$5,000 a week for life. The caller instructed BH and JR to send \$800 in cash to Theresa LAWSON, **897 Fording Island Road, Unit 1213,**

Bluffton, SC 29910. The caller stated the \$800 was needed for taxes on the prize money. Lansing PD contacted the Post Office to retrieve the mailing. The mailing was retrieved by the Bluffton Post Office and returned to victim BH. BH has not received any cash award from the purported sweepstakes.

39. On May 8, 2020, a female identifying herself as Theresa LAWSON called the Bluffton Post Office and inquired about the mailing from victim BH. Theresa LAWSON left phone number (843) 295-9907 as a call back number.

40. On or about May 8, 2020, I issued a summons to AT&T requesting subscriber and call detail records for phone number (843) 295-9907. AT&T records revealed (843) 295-9907 is registered to Theresa LAWSON, 160 University Parkway, Bluffton, SC 29909.

41. On or about May 18, 2020, I issued a summons to AT&T requesting subscriber and call detail records for phone numbers (757) 749-3841 and (843) 227-8217.¹¹ AT&T records revealed (757) 749-3841 was registered to a prepaid customer with no name listed; however, records did list a contact email of rojaylawson360@gmail.com. AT&T records revealed (843) 227-8217 was registered to Rojay LAWSON, **897 Fording Island Road, Unit 1213, Bluffton, SC 29910.** AT&T records also showed a contact email of rojaylawson360@gmail.com.

42. On June 19-20, 2020, myself and Inspector Moody interviewed victims JC and OC in Lake View, SC. OC and JC are 85- and 71-year-old victims who reside in Lake View, SC. OC stated she was contacted on the phone by individuals who purported she won millions of dollars from Publisher's Clearing House. The callers instructed OC she had to send fees

¹¹ Phone numbers (757) 749-3841 and (843) 227-8217 were identified through Western Union records associated with Rojay LAWSON and call detail records associated with Theresa LAWSON.

before she could collect her winnings. The callers instructed OC when, where and how to send the purported fees. OC stated she purchased USPS money orders and sent personal checks attempting to claim the purported winnings. OC maintained written notes of the instructions she received from scammers. Notes provided by OC revealed the name Rojay LAWSON and an account number matching Rojay LAWSON's Wells Fargo account number.

43. JC stated sometime after Christmas 2019, JC began communicating with the scammers to take the stress off OC and try to protect her from the scammers. JC stated the scammers called all the time, all day long. JC provided phone number (870) 888-0550 as the main number used by the scammer. JC identified the scammer as using the name "Mark Davis."

44. JC believes "Davis" opened bank accounts in his name. Davis convinced JC to provide his personal identifying information as part of the scam. JC has received numerous mailings from banks, to include, PNC Bank, TIAA, BB&T, Bluebird and Chase Bank all in his name. JC advised he was instructed to purchase a \$2,000 cashier's check payable to Rojay LAWSON. JC stated most of the money "Davis" instructed him to send went to Rojay LAWSON in Bluffton, SC. JC also deposited USPS money orders directly into Rojay LAWSON's Wells Fargo bank account at the direction of "Davis." Although we do not have bank records for this time, JC confirmed the money transfers with bank receipts.

45. I reviewed JC's cell phone to retrieve phone numbers and text messages associated with the scammers. The following phone numbers were identified as being used by the scammers to contact JC: (702) 815-7084, (870) 888-0550, (843) 888-3026 and (604) 262-2563. The following are summaries of some of the messages reviewed in JC's phone:

- Received from (702) 815-7084 on May 27, 2020: "i am calling you because i spoke with the mega millions and they told me to verify you that you can pay a

small amount of fee cost \$300 dollar and we won't to send you the money immediately. Thank you this is Raquel"

- Received from (870) 888-0550 on June 15, 2020: "Rojay Lawson Bluffton Sc Account number: 1851577930 \$2000"
- Received from (843) 888-3026 on June 21, 2020: "This is the delivery guy with your pack-age so call me when you ready to receive your cashiers check"
- Received from (604) 262-2563 on June 24, 2020: "Good morning i am Doris Smith from Publishing clearing house your money is available"

OC and JC have not received any cash award from the purported sweepstakes.

46. On July 14, 2020, I conducted a check of South Carolina DMV records. Those records revealed Rojay LAWSON to have a SC driver's license which was issued on February 27, 2020. The listed address for Rojay LAWSON is **897 Fording Island Road, Unit 1213, Bluffton, SC 29910**. SC DMV records also listed previous addresses of 160 University Parkway, Okatie, SC and 379 Shadowbrook Lane, Unit 108, Ridgeland, SC.

47. On August 17, 2020, I conducted surveillance of **897 Fording Island Road, Unit 1213, Bluffton, SC 29910**. I observed a Hyundai Sonata registered to Rojay LAWSON parked near apartment 1213. I also observed Rojay LAWSON walking from the area of apartment 1213, enter his vehicle and depart the area.

Summonsed and Subpoenaed Records

48. Throughout the course of the investigation, we issued summonses and subpoenas to financial institutions, money transfer platforms, and mailing services. Records obtained in response to the summonses and subpoenas corroborated and confirmed much of the information obtained from victim and witness interviews.

49. In February 2018, I issued summonses to Western Union, MoneyGram, Ria Financial (“Walmart”), FedEx Ground and FedEx Express. The summonses issued to Western Union, MoneyGram and Walmart requested information related to wire transfers involving Theresa LAWSON.

50. On February 13, 2018, I received a response from Western Union. Western Union records showed Theresa LAWSON received approximately 61 wire transfers from 20 different people, totaling approximately \$17,076, from August 2012 to November 2017. Western Union records showed Theresa LAWSON sent approximately 229 wire transfers to 23 different people, totaling approximately \$62,890, from May 2012 through November 2017.¹² I identified approximately 18 suspected victims, to include IT and BS, that sent money to Theresa LAWSON via Western Union. IT sent five Western Union money transfers to Theresa LAWSON between September and October 2016 totaling \$900. Western Union records showed BS, as detailed in paragraph 37, wired approximately \$1,100 to Rojay LAWSON between December 2017 to March 2018.

51. On February 20, 2018, I received a response from MoneyGram. MoneyGram records showed Theresa LAWSON received approximately 57 wire transfers from 33 different people, totaling approximately \$35,073, from February 2012 to November 2017. MoneyGram records showed Theresa LAWSON sent approximately 185 wire transfers to 14 different people, totaling approximately \$42,770, from August 2012 to June 2017. I identified approximately 18 suspected victims that sent money to Theresa LAWSON via MoneyGram.

¹² Based on my training, experience, and knowledge investigating cases involving the use of wire transfer services, the high volume of wire transfers, to and from different individuals, sent and received by Theresa LAWSON is not typical of legitimate use of wire transfer services and is often an indicator of fraud.

52. On March 13, 2018, I received a response from Ria Financial/Walmart ("Walmart"). Walmart records showed Theresa LAWSON received approximately 54 wire transfers from 19 different people, totaling approximately \$20,486, from March 2016 to January 2018. Walmart records showed Theresa LAWSON sent approximately 9 wire transfers to 7 different people, totaling approximately \$2,490, from June 2017 to January 2018. I identified approximately 12 suspected victims, to include IT and BT, that sent money to Theresa LAWSON via Walmart. As detailed in paragraph 19, IT sent nine Walmart wire transfers to Theresa LAWSON and one Walmart wire transfer to Rojay LAWSON between May 2017 and March 2018 totaling \$1,012. As detailed in paragraph 27, Walmart wire records revealed BT has wired approximately \$3,570 to Theresa and Rojay LAWSON.

53. In January 2019, I issued summonses to Western Union and MoneyGram requesting wire transfer records for Rojay LAWSON. Western Union records showed Rojay LAWSON received approximately 117 wires totaling approximately \$35,467 between January 2014 and September 2018 and sent approximately 51 wires totaling approximately \$14,369 between October 2017 and October 2018. MoneyGram records showed Rojay LAWSON received approximately 73 wires totaling approximately \$22,814 between March 2015 and April 2018 and sent approximately 20 wires totaling approximately \$5,580 between October 2017 and April 2018.

54. In May 2019, I received bank records from Wells Fargo and TD Bank. Wells Fargo records showed Theresa LAWSON maintained at least two accounts and Rojay LAWSON maintained at least two accounts. TD Bank records showed Theresa LAWSON maintained at least two accounts and Rojay LAWSON maintained at least two accounts.

55. Wells Fargo records showed Theresa LAWSON had approximately \$58,843 in

cash deposits and approximately \$8,900 in check/money order deposits from suspected victims between July 2016 and March 2019. Records showed one check from victim JG, as detailed in paragraph 31, deposited into a Wells Fargo account associated with Theresa LAWSON in July 2019. The \$175 check was made payable to “Teresa Lawson, CPA” and had “Pub. Clear Hs” written in the “for” line of the check. Wells Fargo records showed Rojay LAWSON had approximately \$4,843 in cash deposits and approximately \$20,890 in check/money order deposits from suspected victims between September 2018 and March 2019. Records showed victim BJ, as detailed in paragraph 30, purchased approximately 14 Chase money orders totaling \$7,100 and deposited into Rojay LAWSON’s Wells Fargo Bank account between January 2019 and February 2019.

56. TD Bank records showed Theresa LAWSON had approximately \$29,863 in cash deposits and approximately \$1,755 in check/money order deposits from suspected victims between May 2017 and July 2018. TD Bank records showed Rojay LAWSON had approximately \$29,834 in cash deposits and approximately \$8,997 in check/money order deposits from suspected victims between February 2018 and April 2019. As noted above, TD Bank records showed on or about August 5, 2018, a personal check from victim EM in the amount of \$248 was deposited into Rojay LAWSON’s TD Bank account.¹³

57. In March 2020, I received bank records from Bank of America for accounts maintained by Theresa LAWSON and Rojay LAWSON. Records showed Theresa LAWSON maintained at least three accounts and Rojay LAWSON maintained at least one account.

¹³ Based on my training, knowledge and experience investigating financial crimes, I know this to be an unusually high amount of deposits from unknown/unrelated sources into the personal accounts of Theresa and Rojay LAWSON. The frequency and amounts of deposits followed by the subsequent withdrawal of the funds in the LAWSON’s bank accounts are indications of fraud.

Rojay LAWSON's account listed an address of **897 Fording Island Road, Apt 1213, Bluffton, SC 29910**. Bank of America records showed Theresa LAWSON had approximately \$18,315 in cash deposits, approximately \$25,980 in check/money orders and approximately \$1,521 in online bank transfers from suspected victims deposited between January 2015 and November 2017. Bank of America records showed Rojay LAWSON had approximately \$3,765 in cash deposits, approximately \$66,148 in Zelle¹⁴ transfer deposits, and approximately \$94,334 in check/money orders from suspected victims deposited between August 2018 and September 2019. Bank of America records showed approximately 418 cash withdrawals from Rojay LAWSON's account totaling approximately \$160,299.¹⁵ Most of these withdrawals, approximately \$159,373, were made in Jamaica.¹⁶

58. Bank of America records revealed a \$400 Western Union money order purchased by victim WG and two WG personal checks in the amounts of \$350 and \$200 which were deposited into Rojay LAWSON's Bank of America account. Inspector Moody discovered a police report taken by the Kelso Police Department in August 2018. WG is an 83-year-old victim who resides in Kelso, WA. Kelso PD received a referral from Adult Protective Services regarding WG being financially exploited. The referral indicated WG may have Alzheimer's Disease. Kelso PD interviewed WG who revealed WG received phone

¹⁴ Zelle is a way to send money directly between almost any U.S. bank accounts. With just an email address or mobile phone number, you can send and receive money with people, regardless of where they bank.

¹⁵ Based on my training, knowledge and experience investigating financial crimes, I know this to be an unusually high amount of deposits from unknown/unrelated sources into the personal accounts of Theresa and Rojay LAWSON. The frequency and amounts of deposits followed by the subsequent withdrawal of the funds from the LAWSONs' bank accounts in Jamaica are indications of fraud.

¹⁶ Based on my experience of investigating Jamaican sweepstakes/lottery scams, I know most of the scammers reside in Jamaica and the ultimate goal is to transfer the victims' funds to the scammers in Jamaica.

calls from an individual using the name “John Meyers.” Meyers convinced WG to send money to individuals on several occasions.¹⁷ WG stated the payments ranged from \$100 to \$500. WG had been sending money to various unknown individuals throughout the US since at least 2017. WG admitted she was lonely and hearing a friendly voice on the telephone convinced her to send the money. WG is on a fixed income and was not able to pay her rent or bills as a result of being scammed. WG has not received any cash award from the purported sweepstakes.

59. Bank of America records revealed a \$250 Western Union money order purchased by victim RP and MP which was deposited into Rojay LAWSON’s Bank of America account. Further research of victims RP and MP revealed prior contact from the USPIS victim services concerning RPs and MPs involvement in a sweepstakes scam. RP and MP are 90- and 88-year-old (respectively) victims whom reside in Miami, FL. Inspector Moody also discovered two police reports taken by the Aventura Police Department. Aventura PD interviewed MP and MP’s daughter. MP was contacted by an unknown person using the name “Michael Johnson.” Johnson informed MP she won a prize and needed to send money in order to collect the prize. An Aventura PD interview on February 8, 2020, revealed MP has sent hundreds of Western Union money orders to numerous different people over the last five years. The money orders were taxes and fees for prizes and gifts MP thought she had won. MP stated Johnson also deposited money into her bank account and instructed her to withdraw the money and send it either via MoneyGram or deposit the money into a

¹⁷ The Kelso PD report did not provide more details about why Meyers instructed WG to send money. Based on my knowledge and experience of this investigation, it is my belief that WG sent money because she thought she won a sweepstakes and had to pay taxes and fees.

Bank of America account.¹⁸ MP and RP estimated their losses in excess of \$50,000. MP and RP have not received any cash award from the purported sweepstakes.

60. In May 2020, I received bank records from BB&T. BB&T records showed Rojay LAWSON maintained at least two accounts. Rojay LAWSON's account listed an address of **897 Fording Island Road, Apt 1213, Bluffton, SC 29910**. BB&T records showed cash deposits from suspected victims totaling approximately \$14,930 between May 2019 and April 2020. Bank records further showed \$24,376 transferred into Rojay LAWSON's account via Zelle during the same timeframe.

61. On or about May 26, 2020, I issued a summons to Ria Financial/Walmart, FedEx Express and United Parcel Service ("UPS") requesting wire transaction records and delivery records related to Theresa LAWSON, Rojay LAWSON and **897 Fording Island Road, Unit 1213, Bluffton, SC 29910**. Walmart records revealed Rojay LAWSON received approximately 18 wires totaling approximately \$7,903 between November 2017 and February 2019.

62. On June 16, 2020, I received bank records from Regions Bank detailing accounts maintained by Rojay LAWSON and Theresa LAWSON. Bank records showed Rojay LAWSON maintained at least one account with a listed address of **897 Fording Island Road, Unit 1213, Bluffton, SC 29910**. Regions Bank records showed approximately \$47,000 from suspected victims deposited into Rojay LAWSON's account between May 2019 and May 2020 and approximately \$68,500 from suspected victims deposited into Theresa

¹⁸ Based on my experience working sweepstakes scams, I know that victims are often instructed/convinced to use their bank accounts to accept money from other victims. Scammers inform the victims this is part of the sweepstakes winnings but continue to tell the victim they owe more fees/taxes. Scammers use the victim's bank account in an attempt to hide or conceal funds.

LAWSON's account between August 2018 and April 2020. Regions Bank records showed two checks from EM, detailed in paragraph 29, deposited into Regions Bank and TD Bank accounts associated with Rojay LAWSON. The first check was a \$248 personal check deposited on September 7, 2018 and the second check was a \$2,800 Cashier's Check deposited on June 10, 2019. Bank records showed five USPS money orders, totaling \$2,600, sent by victim HP as detailed in that paragraph 35, were deposited into a Regions Bank account associated with Rojay LAWSON between January 2020 and February 2020, including a \$250 USPS money order deposited on January 30, 2020.¹⁹ Regions Bank records showed one check from CC, as detailed in paragraph 33, deposited into a Regions Bank account associated with Theresa LAWSON. The \$65 check was made payable to "Theresa Lawson CPA."

63. On June 16, 2020, I received more bank records from Wells Fargo detailing accounts maintained by Rojay LAWSON and Theresa LAWSON. Bank records showed Rojay LAWSON and Theresa LAWSON each maintained at least one account with a listed address of **897 Fording Island Road, Unit 1213, Bluffton, SC 29910**. Wells Fargo records showed approximately \$100,000 from suspected victims deposited into one of Rojay LAWSON's accounts, including the account with **897 Fording Island Road, Unit 1213, Bluffton, SC 29910** as the listed address, between September 2018 and May 2020. Approximately \$117,450 from suspected victims deposited into one of Theresa LAWSON's accounts, including the account with **897 Fording Island Road, Unit 1213, Bluffton, SC 29910** as the listed address, between February 2018 and April 2020. A further review of

¹⁹ USPS records showed the money orders were purchased in California by victim HP. Also, two of the USPS money orders had Shakera Snyder's name listed.

Rojay LAWSON's Wells Fargo account revealed numerous USPS money orders being deposited into his account. The USPS money orders were made payable to Rojay LAWSON, and some listed victims JC and OC, as set forth in paragraphs 42-45, as the purchasers. These USPS money orders were purchased in Lake View, SC.

DEVICE TECHNOLOGY

64. Based on my training and experience, I use the following technical terms to convey the following meanings:

- a. Wireless telephone: A wireless telephone (or mobile telephone, or cellular telephone) is a handheld wireless device used for voice and data communication through radio signals. These telephones send signals through networks of transmitter/receivers, enabling communication with other wireless telephones or traditional "land line" telephones. A wireless telephone usually contains a "call log," which records the telephone number, date, and time of calls made to and from the phone. In addition to enabling voice communications, wireless telephones offer a broad range of capabilities. These capabilities include: storing names and phone numbers in electronic "address books"; sending, receiving, and storing text messages and e-mail; taking, sending, receiving, and storing still photographs and moving video; storing and playing back audio files; storing dates, appointments, and other information on personal calendars; and accessing and downloading information from the Internet. Wireless telephones may also include global positioning system ("GPS") technology for determining the location of the device.

65. Based on my training and experience, individuals who engage in telemarketing and financial crimes will communicate and utilize wireless telephones to send and receive information

either through voice or electronic communication such as e-mails, text messages, phone numbers, voice messages, memos, notes, or photographs and store such information on said devices.

FORENSIC ANALYSIS

66. Forensic evidence. As further described in Attachment B, this application seeks permission to locate not only electronically stored information that might serve as direct evidence of the crimes described on the warrant, but also forensic evidence that establishes how the devices were used, the purpose of such use, who used them, and when. There is probable cause to believe that this forensic electronic evidence might be on the devices because:

- a. Data on the storage medium can provide evidence of a file that was once on the storage medium but has since been deleted or edited, or of a deleted portion of a file.
- b. Forensic evidence on a device can also indicate who has used or controlled the device. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence.
- c. A person with appropriate familiarity with how an electronic device works may, after examining this forensic evidence in its proper context, be able to draw conclusions about how electronic devices were used, the purpose of their use, who used them, and when.
- d. The process of identifying the exact electronically stored information on a storage medium necessary to draw an accurate conclusion is a dynamic process. Electronic evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether data stored on a device is evidence may depend on other information stored on the device and the application of knowledge

about how a device behaves. Therefore, contextual information necessary to understand other evidence also falls within the scope of the warrant.

- e. Further, in finding evidence of how a device was used, the purpose of its use, who used it, and when, sometimes it is necessary to establish that a particular thing is not present on a storage medium.

ANALYSIS OF ELECTRONIC DATA

67. The analysis of electronically stored data, whether performed on-site or in a laboratory or other controlled environment, may entail any or all of several different techniques. Such techniques may include, but shall not be limited to, surveying various file directories and the individual files they contain (analogous to looking at the outside of a file cabinet for the markings it contains and opening a drawer capable of containing pertinent files, in order to locate the evidence and instrumentalities authorized for seizure by the warrant); opening or reading the first few pages of such files in order to determine their precise contents; scanning storage areas to discover and possibly recover deleted data; scanning storage areas for deliberately hidden files; and performing electronic key-word searches through all electronic storage areas to determine whether occurrences of language that are intimately related to the subject matter of the investigation exist and are contained in such storage areas.

CONCLUSION

68. Based on the above information, there is probable cause to believe that the Specified Federal Offenses listed herein have been violated and that the items listed in Attachment B will likely be found at **897 Fording Island Road, Unit 1213, Bluffton, SC 29910**. Accordingly, this Affiant respectfully requests that this Court issue a search warrant for **897 Fording Island Road, Unit 1213, Bluffton, SC 29910**, more particularly described in Attachment A, authorizing

the seizure of the items described in Attachment B, which constitute evidence, contraband, fruits, and other items related to violations of the Specified Federal Offenses.

Assistant United States Attorney Emily Limehouse has reviewed this Affidavit.



David P. Moody
Special Agent
ICE - Homeland Security Investigations

Sworn to before me this
1st day of September, 2020



Hon. Molly H. Cherry
United States Magistrate Judge
District of South Carolina